



February 6, 2006

VIA ELECTRONIC FILING

Enforcement Bureau
Federal Communications Commission

Re: **Certification of CPNI Filing (February 6, 2006) –
EB Docket No. 06-36 / EB-06-TC-060**
Global Internetworking, Inc.

To Whom It May Concern:

Please find attached hereto the above-referenced certification provided on behalf of Global Internetworking, Inc. for electronic filing in EB Docket No. 06-36 and EB 06-TC-060. Pursuant to the Public Notice released February 2, 2006, copies of this certification are being sent via electronic mail to the parties noted below.

If there are any questions regarding this filing, please contact the undersigned at the number provided below.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael R. Romano".

Michael R. Romano

Vice President & General Counsel

Enclosure

cc: Byron McCoy
Best Copy and Printing

8484 WESTPARK DRIVE
SUITE 720
MCLEAN, VA 22102
TOLL FREE: 866-POP2POP
VOICE: 703-442-5500
FAX: 703-442-5501

CERTIFICATION

I certify that I am an officer of Global Internetworking, Inc., and that I have personal knowledge that the company has established operating procedures as explained in the accompanying statement that are adequate to ensure compliance with the Federal Communications Commission's rules governing use of Customer Proprietary Network Information.

Printed Name: DMichael KEWAN Position: CEO

Signature:  Date: 2/3/06

**STATEMENT OF GLOBAL INTERNETWORKING, INC.
REGARDING OPERATING PROCEDURES RELATIVE
TO THE PROTECTION OF CUSTOMER INFORMATION**

Global Internetworking, Inc. ("GII") operates primarily as a reseller of dedicated transport services, providing such services to other carriers, service providers, and enterprises. As a reseller, GII is highly sensitive to, and has strong incentives to prevent, the unauthorized or otherwise impermissible disclosure of confidential information relating to customers and their service requirements. GII therefore has implemented a number of operating processes and steps to ensure that Customer Proprietary Network Information ("CPNI")¹ is maintained subject to adequate protection, and that each customer's CPNI is used and disclosed only to the extent necessary to initiate and provide telecommunications services to which that customer has subscribed or for other purposes permitted by law.

GII neither refers to nor utilizes customers' CPNI in undertaking its marketing campaigns. To the extent that GII were to conduct campaigns with respect to existing customers that rely upon CPNI, those campaigns would be limited to service offerings within the same category of service (i.e. dedicated transport) to which the customers already subscribe. GII does not share any CPNI with third parties as part of any sales or marketing campaigns; no information regarding any service quantity, technical configuration, type, destination, location or amount of use of services is provided to any third party in connection with such campaigns. Marketing campaigns are subjected to review by the company's legal department and other officers for compliance with confidentiality requirements and other applicable laws and contract requirements. In the event and to the extent that GII were to make specific use of CPNI to support marketing campaigns, GII would follow the appropriate approval procedures and also maintain records for at least one year to specify when and how CPNI was to be used.

GII has also created and implemented a number of other systems and processes designed to prevent improper disclosure of CPNI. GII has trained and reiterated to its employees that information obtained in the course of their employment with the company is considered confidential, and that such information is not to be shared with third parties. All GII employees are required to sign confidentiality agreements upon commencement of employment, committing to protect such information both during and after the course of their employment from impermissible disclosure and to use such information only for the purposes of the company's provision of services to its customers.

All GII employees also have acknowledged receipt and review of the company's code of conduct, which reiterates GII's commitment to maintain the confidentiality of customer and vendor information, notifies employees that failure to do so will be subject to disciplinary action (up to and including termination), and sets forth a requirement and associated process for the reporting of violations. In particular, the GII code of conduct expressly specifies the process to be followed prior to any disclosure of a customer's confidential information: "Under no circumstances should confidential information received from another company be shared with any third party without prior consultation with, and express approval from, GII's CEO or General Counsel." The code of conduct further clarifies that if an employee has "any doubts as to what you can and cannot disclose, you should contact the CEO or General Counsel prior to any disclosure."

¹

47 U.S.C. § 222(h)(1).

Statement of Global Internetworking, Inc.

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Furthermore, as a provider/reseller of services primarily to other carriers and large enterprises and institutions, GII's standard policy is to execute a nondisclosure agreement (or similar terms) with every customer and vendor, in order to set forth the permitted uses of confidential information and otherwise ensure that all parties have a common understanding of the obligations to maintain and prevent unauthorized use of all confidential information, including, but not limited to, CPNI.

Finally, GII has established a compliance contact for oversight and reporting of issues pertaining to CPNI and confidentiality matters as follows:

Michael R. Romano
Vice President & General Counsel
Global Internetworking, Inc.
8484 Westpark Drive, Suite 720
McLean, VA 22102
Telephone: (703) 442-5515
Facsimile: (703) 442-5595
E-Mail: mromano@globalinternetworking.com

Questions regarding this statement may be directed to the foregoing.